REMARKS

The non-final Office Action mailed August 4, 2009 has been carefully reviewed. From the Summary page, claims 1-20 are pending. An objection was made to claims 4, 7-8, 11, 15-16 and 19 for reciting allowable subject matter but depending upon a rejected base claim. Claims 1-3, 5, 6, 9-10, 12-14, 17-18 and 20 are rejected. The Drawings filed June 28, 2004 have been accepted. Acknowledgment has been made of Applicant's Claim for Priority. The Information Disclosure Statement filed August 9, 2004 has been considered.

By this response, Applicant has amended each of claims 1, 4, 8, 13, 15 and 16. No new statutory matter has been added. Support for the claim amendments are found in the original disclosure.

Objection to Title

The Title of the Invention has been amended pursuant to the Office Action's objection thereto. Thus, reconsideration and withdrawal of the objection are courteously solicited by Applicant.

Claim Objections

An objection was made to claims 4 and 14 because of improper antecedent basis for the features of "the shafts" and "the fitting holes".

A telephone call was placed to the Examiner on October 29, 2009 regarding the objection to claim 14. The Examiner agreed that the objection to claim 14 was made in error because the above-mentioned features are not recited thereon. Accordingly, the objection to claim 14 is moot.

As to claim 4, amendments have been made, *supra*, to remedy the issues concerning antecedent basis.

Further, Applicant has amended claim 16 to correct a similar antecedent basis issue as described above.

Regarding claims 8 and 15, the Office Action has taken the position that "a cap-shaped pressing member" is an indefinite structure. Applicant has replaced this description with the

phrase "pressing member comprising a cylindrical portion and a closing wall". Support for this amendment can be found on pg. 21, ll. 31-33 of the specification.

In view of the foregoing, Applicant requests reconsideration and withdrawal of the claim objections.

Claim Rejections - 35 U.S.C. § 103(a)

Claims 1-3, 5-6, 13 and 14 stand rejected as being unpatentable over Sasaki (US 4,743,927) in view of Kimura (US 5,475,484). The rejection is respectfully traversed.

Claims 1 and 13, as amended, recite the drum unit as comprising, "*a drum-holding frame for holding a photosensitive drum, an exposure means-holding frame for holding an exposure means, the exposure means-holding frame being supported on the drum-holding frame so as to move in an axial direction of the photosensitive drum relative to the drum-holding frame, and a pressing means for pressing the exposure means-holding frame from one side toward the other side in the axial direction of the photosensitive drum*". The above mentioned features are not taught or suggested by the asserted patent combination.

To ensure understanding reference is made to Applicant's figures. Specifically, Figs. 2 and 4 show a photoconductive unit 310 which comprises a drum-holding frame 100. See para. [0047]. The drum-holding frame holds a photosensitive drum 2 so that it can freely rotate. An exposure means-holding frame 202, being supported by the drum-holding frame, supports an exposure means 200 which can form an electrostatic latent image on the peripheral surface of the photosensitive drum. As shown in FIG. 9, a pressing means 40, via a pressing member 46 and spring 48, exerts pressure upon the exposure means-holding plate. See para. [0076]. The exposure means-holding frame, which is supported on the drum-holding frame, moves in an axial direction toward the drum-holding frame, so as to be pressed and secured together by resilient pushing forces. Thus, the exposure means (i.e., LED heads 200) mounted on the exposure means-holding plate are aligned at predetermined positions with increased precision so that color deviation can be suppressed. See para. [0078]. Effectively, good images are produced.

On the other hand, Sasaki describes an LED array module 4 that is mounted between frames 20 of the photographic printer. See FIGs. 1-2. The LED array module moves via a

spring 12 and vibrator 14 in the axial direction of the photosensitive drum 2. However, the LED array module is not movably supported on a drum-holding frame. Moreover, Sasaki's invention is understood to focus upon reciprocating movement of the LED array module. Thus, Applicant's objective for improving precision in the mounting position of the exposing means, which objective is achieved by the structural features of "*the exposure means-holding frame is supported on the drum-holding frame*" is not taught or suggested by Sasaki.

It is urged that Kimura fails to remedy the deficiencies of Sasaki with respect to the above-mentioned features. Specifically, Kimura does not describe an exposing device of an exposing frame that is mounted on the drum-holding frame. See col. 8, ll. 13-25. As such, the obviousness rejection must fail. Therefore, amended claims 1 and 13, and claims 2-3, 5-6 and 14, dependent thereon, patentably distinguish over the combination of Sasaki and Kimura.

Claims 9-10, 12, 17-18 and 20 stand rejected as being unpatentable over Sasaki in view of Kimura and Nagamine et al. (US 2002/0149664). The rejection is respectfully traversed.

Applicant submit that Nagamine does not remedy the deficiencies of Sasaki and Kimura. Therefore, Applicant advances similar arguments as presented for claims 1 and 13 herein. As such, this obviousness rejection also must fail. Therefore, claims 9-10, 12, 17-18 and 20 patentably distinguish over the asserted art.

In view of the foregoing, Applicant earnestly requests reconsideration and withdrawal of both rejections.

CONCLUSION

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Therefore, it is respectfully requested that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. It is believed that a full and complete response has been made to the outstanding Office Action and, as such, the present application is in condition for allowance.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

If any fees under 37 C. F. R. §§ 1.16 or 1.17 are due in connection with this filing, please charge the fees to Deposit Account No. 02-4300, Order No. 032739M097.

Respectfully submitted,

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